

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

UNITED STATE OF AMERICA,	)	NO. 20-CR-00146-JCC
Plaintiff,	)	
vs.	)	MOTION TO CONTINUE TRIAL
	)	DATE AND PRETRIAL MOTION
	)	DEADLINES
JESUS DANIEL LERMA-JARAS,	)	
Defendant.	)	<b>NOTE ON MOTION CALENDAR:</b>
	)	<b>September 24, 2021</b>

**TO: Clerk, U.S. District Court, Western District of Washington;**

**TO: Assistant United States Attorney, Stephen Hobbs**

**TO: Assistant United States Attorney, C. Andrew Colasurdo**

COMES NOW, Ken Therrien, the attorney for the defendant Jesus Daniel Lerma-Jaras, and moves the court for an order continuing the trial date from November 8, 2021 to May 30, 2022. This motion is based upon the files and records herein and the Declaration of Counsel filed herewith.

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MOTION TO CONTINUE TRIAL DATE AND PRETRIAL  
MOTION DEADLINES  
(No. 20-CR-00146-JCC) - 1

**KEN THERRIEN, PLLC**  
413 NORTH SECOND STREET  
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**DECLARATION**

Ken Therrien upon oath deposes and states:

I am the Attorney for the defendant. I was appointed to this case on February 25, 2021 (Dkt # 57).

Mr. Lerma-Jaras was arraigned under case number 20-CR-00146-JCC on September 17, 2020 (Dkt # 29). Mr. Lerma-Jaras is requesting a continuance of the Trial date and time to file Pre-Trial Motions. The Trial date that is requested is May 30, 2022 at 9:00 a.m. in Seattle, WA. Additional time is necessary for defense counsel to review discovery, investigate the case, prepare pre-trial motions, and prepare the case for trial.

Due to the re-opening of Courts in the State of Washington, Counsel presently has cases scheduled to go to trial in various courts through the end of October 2021. Counsel will commence a First-Degree Murder trial in Yakima County on October 18, 2021 which is expected to conclude the week of November 1, 2021.

Counsel has communicated with AUSA Stephen Hobbs regarding the proposed date given by Courtroom Deputy of May 30, 2022. AUSA Hobbs is in agreement with said date.

DATED this 15th day of September, 2021.

*s/ Ken Therrien*

KEN THERRIEN, WSBA #20291  
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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 15, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

- Stephen Hobbs, Assistant United States Attorney
- C. Andrew Colasurdo, Assistant United States Attorney

s/ Ken Therrien

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